

Arnold & Porter

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December 12, 2024

VIA CM/ECF

Hon. Miroslav Lovric
United States Magistrate Judge
Northern District of New York
Federal Building and U.S. Courthouse
15 Henry Street
Binghamton, New York 13901

Re: *Honeywell International Inc. v. Sunoco (R&M), LLC et al.*, No. 5:18-cv-01176 (FJS/ML).

Dear Judge Lovric,

Plaintiff Honeywell International, Inc. (“Honeywell”) and Defendants Energy Transfer (R&M), LLC and ETC Sunoco Holdings LLC (collectively, “Sunoco Defendants”), (together with Honeywell, “the Parties”), jointly submit this letter to request a 30-day extension of the Court’s Discovery Order, *see* ECF No. 378, to allow for the finalization of a settlement agreement between the Parties in the above-captioned case (“Sunoco Case”).

As noted in their recent status report, the Parties participated in a mediation session with John Barkett today. *See* ECF No. 433. With Mr. Barkett’s assistance, the Parties reached an agreement in principle to settle the matter. The Parties will submit their Report of Mandatory Mediation as required by General Order 47 on or before the deadline for completion of mediation on December 31, 2024.

Given the upcoming holidays and need for key decisionmakers’ participation in finalizing the settlement agreement, the Parties respectfully submit that good cause exists under Federal Rule Civil Procedure 16 to issue a 30-day extension of the Court’s Discovery Order for the remaining deadlines. This request does not affect nor impact the other parties to the consolidated case (5:18-cv-0646- (FJS/ML)), nor the deadlines associated therewith.

Rule 16 permits the Court, in its discretion, to enter such orders as are necessary to facilitate the “just, speedy, and inexpensive disposition of the action.” Accordingly, the

Arnold & Porter

Hon. Miroslav Lovric
December 12, 2024
Page 2

Parties jointly respectfully request that the Court extend all remaining deadlines by 30-days.

Sunoco Defendants authorized me to file this letter on their behalf. Thank you for your consideration of this request.

Best regards,

/s/ Tyler Burgess
Tyler Burgess